

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of themselves
and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC
and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10501 (PBS)

**JOINT MOTION TO EXTEND THE DEADLINES FOR
EXPERT DISCOVERY AND MOTIONS FOR SUMMARY JUDGMENT**

Plaintiffs in the above-captioned actions and Defendant Dexia Bank Belgium (“Dexia”), file this joint motion to extend the deadlines for expert discovery and motions for summary judgment in the above-captioned actions. The parties respectfully request that this Court amend the current scheduling order dated June 5, 2006 for the limited purpose of extending the deadlines for expert discovery and any motions for summary judgment by two months to allow for the conclusion of Court-ordered discovery and the analysis of that discovery by the parties’ designated experts. In support of this motion, the parties state as follows:

1. On June 5, 2006, the Court entered an order amending the scheduling order, establishing the following deadlines for expert discovery and motions for summary judgment:

August 31, 2006: Deadline For Expert Reports Concerning Any Matters For Which Any Party Bears The Burden Of Proof.

October 15, 2006: Deadline For Rebuttal Expert Reports

November 22, 2006: Deadline For The Completion Of Expert Depositions

December 22, 2006: Deadline For Any Motion For Summary Judgment

2. Despite the close of fact discovery on June 16, 2006, several discovery motions remained pending after that date. In particular, the Court has ordered an additional four depositions to date, which are currently either scheduled for September or likely to be scheduled for September/early October. Similarly, the Court has overruled Dexia’s objection to the production of documents related to Artesia Securities, which will result in the production of additional documents by Dexia by the end of this month. In addition, there are discovery motions still pending before the Court that could result in additional depositions.

3. In order to complete this remaining discovery, and to allow the parties’ experts sufficient time to review that discovery, the parties submit that this Court should allow for a brief

extension of expert discovery by two months. The parties submit that such an extension is preferable over the costly and time-intensive alternative of having experts continually supplement and update their reports based on new depositions and evidence.

4. As a result of this requested extension for the deadline for expert reports, the parties submit the deadlines for expert depositions and motions for summary judgment likewise should be extended. Given the December holidays, the parties have agreed to a slightly longer extension of time for expert depositions (69 days), with the deadline for motions for summary judgment to occur one month thereafter. Under the proposed schedule these cases will still be on track for a pre-trial conference early in the New Year.

WHEREFORE, the parties jointly request that this Court extend the deadlines for expert discovery and motions for summary judgment as follows:

October 31, 2006: Deadline For Expert Reports Concerning Any Matters For Which Any Party Bears The Burden Of Proof;

December 15, 2006: Deadline For Rebuttal Expert Reports;

January 31, 2007: Deadline For The Completion Of Expert Depositions;

February 28, 2007: Deadline For Any Motion For Summary Judgment.

Dated: August 17, 2006

Respectfully submitted,

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